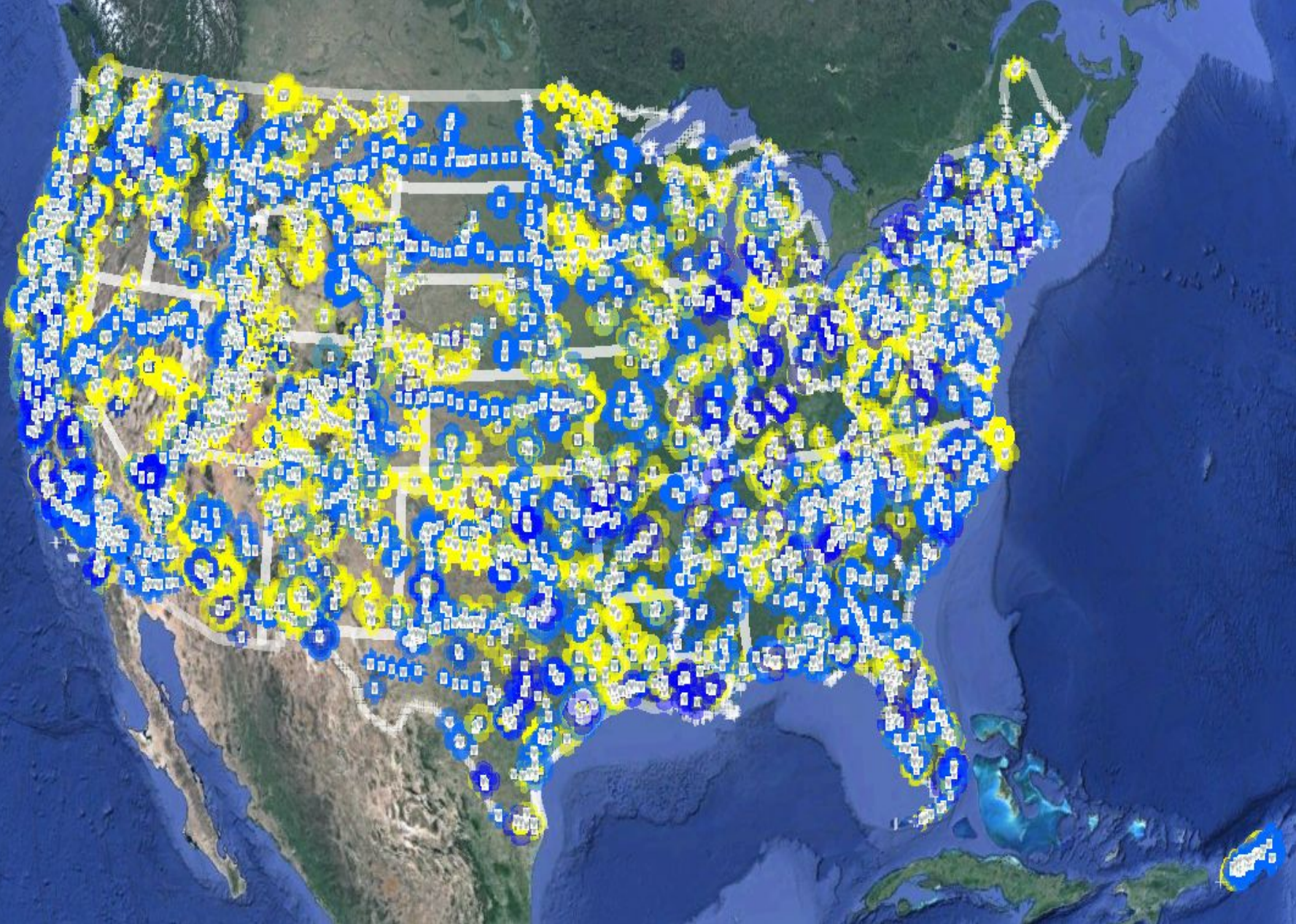




MEETING WITH FCC CHAIRMAN PAI

MARCH 28, 2017



**LPTV
SPECTRUM
RIGHTS
COALITION**

**POST AUCTION - 10,000 CLASS A, LPTV, & TV TRANSLATOR LICENSED STATIONS, NEW
CONSTRUCTION PERMITS, AND PENDING APP'S - ESTIMATED TOTAL OF 2 BILLION TV POPS
(12 BILLION MHZ POPS)**

STATE OF THE INDUSTRY

Post repack there will be about

10,000

Class A, LPTV, and TV translator licensees

based on current licenses, new construction permits,
and already accepted pending applications

which will transmit from as many as

2,267

communities of license



STATE OF THE INDUSTRY

Of these about

5800

are current licensed facilities

2700

are construction permits

1300

are accepted applications,
plus the remaining Class A's



STATE OF THE INDUSTRY

When fully built out these

10,000

will reach about

2 Billion TV pops

(12 Billion MHz pops!)

50%

in the top 25 markets

in comparison the full powers pre-auction had 4 Billion TV pops



STATE OF THE INDUSTRY

Many in the industry are experiencing financial stress due to the long period of uncertainty from the auction/repack, and the anticipated costs of relocation

This includes over

300+

Civic/Ed/Gov't groups
which control as many as

3000+

LPTV and TV translator licenses and permits

50%

of the current fleet of 5900 operating stations
and **33%** of the post repack fleet of 10,000



AUCTION IMPACTS

About

3150

**LPTV & TV Translator licenses and permits
will be displaced from**

UHF 38-50



AUCTION IMPACTS

About

900-1200

licenses and permits
may be displaced from

VHF 2 to UHF 36

as a result of the repacking
for a total of about

4000+

displacements



AUCTION IMPACTS

GAO estimated between
\$50k to \$600k
in relocation costs per station

and NAB estimated for a Class A

\$390k

the Coalition estimated a blended average of

\$150k

a station in either rural or urban areas



AUCTION IMPACTS

Total displacement cost total could range from

\$100M - \$1B

**5+ years of stalled business plans and
build-out's while waiting for auction.**

80%

**of the spectrum sold in the auction was
licensed or permitted by LPTV and TV
translators**



AUCTION IMPACTS

THIS IS
THE LPTV AUCTION!



RESEARCH ASKS

- > Study the 4000+ auction & repack displacements
- > Study the loss of public service obligations from the auction and repack
- > Study how LPTV spectrum can be repurposed to help solve the digital divide

PROCESS ASKS

- > Continue the sunshine**
- > Assign all licenses & permits to a Transition Phase, and PEA**
- > Host an industry webinar before the LPTV displacement window**
- > Harmonize the CDBS and LMS before the LPTV filing window**
- > Increase engineering staff to timely handle the 4000+ app's**
- > Timely rule on LPTV Next Gen experimental licenses**

REGULATION ASKS

- > Maintain the LPTV current “light touch and innovation friendly” regulatory framework within the Next Gen ATSC 3.0 rulemaking**
- > Utilize the FCC’s discretionary authority to provide service waivers for the use of LPTV spectrum as wireless internet service providers in digital divide counties**



LEGISLATIVE ASKS

> The FCC should ask Congress for a bill rider to open a new, long term Class A window to replenish the loss of the public service obligations from the auction

Although we believe that the FCC already has authority

> The FCC should ask Congress for a bill rider to allow it to provide flexible use service waivers for LPTV which are in digital divide counties

Although we believe that the FCC already has authority



KEY POINT

**OUR VIEWERS
ARE NOT
SECONDARY!**